

**BATHAE DUNNE LLP**  
Yavar Bathae (CA 282388)  
yavar@bathaeedunne.com  
Andrew C. Wolinsky (CA 345965)  
awolinsky@bathaeedunne.com  
445 Park Avenue, 9th Floor  
New York, NY 10022  
(332) 322-8835

Brian J. Dunne (CA 275689)  
bdunne@bathaeedunne.com  
Edward M. Grauman (*pro hac vice*)  
egrauman@bathaeedunne.com  
901 S. MoPac Expressway  
Barton Oaks Plaza I, Suite 300  
Austin, TX 78746  
(213) 462-2772

*Interim Co-Lead Counsel for the  
Advertiser Classes*

**SCOTT+SCOTT ATTORNEYS AT LAW LLP**  
Amanda F. Lawrence (*pro hac vice*)  
alawrence@scott-scott.com  
Patrick J. McGahan (*pro hac vice*)  
pmcgahan@scott-scott.com  
Michael P. Srodoski (*pro hac vice*)  
msrodoski@scott-scott.com  
156 South Main Street, P.O. Box 192  
Colchester, CT 06415  
Tel.: (860) 537-5537

Patrick J. Coughlin (CA 111070)  
pcoughlin@scott-scott.com  
Carmen A. Medici (CA 248417)  
cmedici@scott-scott.com  
Hal D. Cunningham (CA 243048)  
hcunningham@scott-scott.com  
Daniel J. Brockwell (CA 335983)  
dbrockwell@scott-scott.com  
600 W. Broadway, Suite 3300  
San Diego, CA 92101  
Tel.: (619) 233-4565

(Additional counsel on signature page)

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

Hon. James Donato

**ADVERTISER PLAINTIFFS' INTERIM  
ADMINISTRATIVE MOTION TO FILE  
DOCUMENTS UNDER SEAL PURSUANT  
TO CIVIL LOCAL RULE 79-5 AND THE  
COURT'S MARCH 25, 2024 ORDER**

Pursuant to Civil Local Rules 7-11 and 79-5 and the Stipulated Order Modifying Sealing Procedures Relating to Dispositive Motions and Merits *Daubert* Briefing, entered in this action on March 25, 2024 (Dkt. 745), Advertiser Plaintiffs Affilious, Inc., Jessyca Frederick, Mark Berney, 406 Property Services, PLLC, Mark Young, and Katherine Looper (“Advertiser Plaintiffs”) submit this interim administrative motion to file under seal the unredacted versions of Advertiser Plaintiffs’ Notice of Motion, Motion to Exclude Opinion Testimony of Dr. Catherine Tucker, and memorandum in support, as well as Exhibits 1-8 to the Declaration of Brian J. Dunne in their entirety. Pursuant to the Court’s Order (Dkt. 745), whether these materials should remain under seal will be discussed in forthcoming Omnibus Sealing Motions, to be filed no later than June 27, 2024.

Advertiser Plaintiffs respectfully request that the documents filed provisionally under seal herewith be maintained under seal pending a decision by the Court on the parties’ forthcoming Omnibus Sealing Motions.

Dated: April 5, 2024

Respectfully submitted,

By: /s/ Brian J. Dunne

**SCOTT+SCOTT ATTORNEYS AT LAW LLP**

**BATHAE DUNNE LLP**

Amanda F. Lawrence (*pro hac vice*)  
alawrence@scott-scott.com  
Patrick J. McGahan (*pro hac vice*)  
pmcgahan@scott-scott.com  
Michael P. Srodoski (*pro hac vice*)  
msrodoski@scott-scott.com  
156 South Main Street, P.O. Box 192  
Colchester, CT 06415  
Tel.: (860) 537-5537

Yavar Bathae (CA 282388)  
yavar@bathaeedunne.com  
Andrew C. Wolinsky (CA 345965)  
awolinsky@bathaeedunne.com  
Adam Ernette (*pro hac vice*)  
aernette@bathaeedunne.com  
Priscilla Ghita (*pro hac vice*)  
pghita@bathaeedunne.com  
Chang Hahn (*pro hac vice*)  
chahn@bathaeedunne.com  
445 Park Avenue, 9th Floor  
New York, NY 10022  
(332) 322-8835

Patrick J. Coughlin (CA 111070)  
pcoughlin@scott-scott.com  
Carmen A. Medici (CA 248417)  
cmedici@scott-scott.com  
Hal D. Cunningham (CA 243048)  
hcunningham@scott-scott.com  
Daniel J. Brockwell (CA 335983)  
dbrockwell@scott-scott.com  
600 W. Broadway, Suite 3300  
San Diego, CA 92101  
Tel.: (619) 233-4565

Brian J. Dunne (CA 275689)  
bdunne@bathaeedunne.com  
Edward M. Grauman (*pro hac vice*)  
egrauman@bathaeedunne.com  
Andrew M. Williamson (CA 344695)

1 Patrick J. Rodriguez (*pro hac vice*)  
2 prodriguez@scott-scott.com  
3 230 Park Avenue, 17th Floor  
New York, NY 10169  
Tel.: (212) 223-6444

awilliamson@bathaeedunne.com  
901 S. MoPac Expressway  
Barton Oaks Plaza I, Suite 300  
Austin, TX 78746  
(213) 462-2772

**AHDOOT & WOLFSON, PC**

4 Tina Wolfson (CA 174806)  
5 Robert Ahdoot (CA 172098)  
6 Theodore W. Maya (CA 223242)  
7 Henry J. Kelston (*pro hac vice*)  
8 2600 West Olive Avenue, Suite 500  
9 Burbank, CA 91505  
Telephone: (310) 474-9111  
Facsimile: (310) 474-8585  
twolfson@ahdootwolfson.com  
rahdoot@ahdootwolfson.com  
tmaya@ahdootwolfson.com

Allison Watson Cross (CA 328596)  
across@bathaeedunne.com  
3420 Bristol St., Ste 600  
Costa Mesa, CA 92626-7133

**LEVIN SEDRAN & BERMAN LLP**

Keith J. Verrier (*pro hac vice*)  
Austin B. Cohen (*pro hac vice*)  
510 Walnut Street, Suite 500  
Philadelphia, PA 19106-3997  
Tel.: (215) 592-1500  
Fax: (215) 592-4663  
kverrier@lfsblaw.com  
acohen@lfsblaw.com

12 *Interim Co-Lead Counsel and Executive Committee*  
13 *for the Advertiser Classes*